



October 16, 2014

Felicia Marcus, Chair  
Thomas Howard, Executive Director  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95812  
Via email: felicia.marcus@waterboards.ca.gov, thomas.howard@waterboards.ca.gov

RE: ACL Complaint R7-2014-0041, National Beef California, LP

Dear Ms. Marcus and Mr. Thomas:

Greenaction for Health and Environmental Justice joins with Comite Civico del Valley in urging the State Water Resources Control Board to prosecute the referenced National Beef administrative civil liability complaint under Water Code Sections 183, 13320 and other applicable laws as the Colorado River Basin Regional Board has requested. We believe that National Beef and other slaughterhouses and animal feeding operations in Imperial County must comply with required pretreatment regulations. It is not in the public interest for serious, repeated violations to fall through the cracks, unpunished. The State Board must not let that happen – it should prosecute the referenced National Beef administrative civil liability complaint.

The water quality of the Colorado River Basin and the health of its residents require strong protection, and the laws should be upheld and enforced.

We also agree with our colleague organizations that it is extremely important that any administrative civil liability penalties or supplemental environmental projects be directed to local efforts within Imperial County and the Colorado River Basin, whether it is the New River, Salton Sea restoration, or other meritorious local projects. Please keep local projects in mind with regard to the National Beef and other administrative civil liability complaints. These funds can do great good if wisely spent within Imperial County and the Colorado River Basin.

Please do not let enforcement in the region fall through the cracks. The State Water Resources Control Board must prosecute the referenced National Beef administrative civil liability complaint under Water Code Sections 183, 13320 and other applicable laws and regulations.

Sincerely,

Bradley Angel  
Executive Director

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